

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 19-029 (AET)
	:	
v.	:	
	:	Honorable Anne E. Thompson
GEORGE GILMORE	:	

**NOTICE OF MOTION TO INQUIRE INTO
DEFENDANT'S COUNSEL'S POTENTIAL CONFLICTS OF INTEREST**

TO: Kevin H. Marino, Esq.
Marino, Tortorella & Boyle, P.C.
437 Southern Boulevard
Chatham, New Jersey 07928-1488
Counsel for Defendant George Gilmore

PLEASE TAKE NOTICE that on a date to be determined by the Court, as soon as counsel may be heard, the United States, by and through its attorney, Rachael A Honig, Attorney for the United States Acting under authority conferred by 28 U.S.C. § 515, Matthew J. Skahill, Deputy U.S. Attorney, Jihee G. Suh, Assistant U.S. Attorney, and Thomas F. Koelbl, Trial Attorney, U.S. Department of Justice–Tax Division, will move before the Honorable Anne E. Thompson, Senior United States District Judge, to inquire into defendant's counsel's potential conflicts of interest.

The United States will rely upon oral argument and its memorandum of law, filed herewith.

Respectfully submitted,

RACHAEL A. HONIG
Attorney for the United States Acting under
authority conferred by 28 U.S.C. § 515

By: s/ Matthew J. Skahill
s/ Jihee G. Suh
MATTHEW J. SKAHILL
JIHEE G. SUH
Assistant United States Attorneys

s/ Thomas F. Koelbl
THOMAS F. KOELBL
Trial Attorney
U.S. Department of Justice – Tax Division

Dated: February 1, 2019

CERTIFICATE OF SERVICE

I certify that on February 1, 2019, a copy of the foregoing Notice of Motion to Inquire Into Defendant's Counsel's Potential Conflicts of Interest, accompanying Memorandum of Law of the United States in Support of Its Motion to Inquire Into Defendant's Counsel's Potential Conflicts of Interest, and proposed Order were filed on ECF and a copy sent by Federal Express to defendant's counsel of record, Kevin H. Marino, Esq.

s/ Jihee G. Suh
Jihee G. Suh

Dated: February 1, 2019